## DECLARATION OF GERALD ARMSTRONG

I, Gerald Armstrong, declare under the pains and penalties of perjury as follows:

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1. I was in Scientology from 1969 through 1981 and held many organization positions during those years. I met Omar V.

Garrison in 1980 when I was working for L. Ron Hubbard, founder and director of Scientology, as his biography researcher.

Hubbard's attorney arranged a contract between Mr. Garrison and Hubbard's Danish publishing company AOSH PDK, and pursuant to that contract I worked with Mr. Garrison as his research assistant until I left Hubbard's employ in December 1981.

Thereafter I also assisted Mr. Garrison with the Hubbard biography research, although not on a full-time basis, until sometime in 1983.

2. In March 1985 as ordered by the Court in the case of Christofferson vs. Scientology, number A 7704-05184, in the Circuit Court of the State of Oregon, for the County of Multnomah, defendant organization produced for me what was purported to be my B-1 file. (B-1 was the designation given Bureau One of Scientology's Guardian's Office (GO), the Intelligence Bureau. B-1 was responsible for a wave of criminal activity against critics of Hubbard and Scientology which resulted in the conviction and imprisonment of 11 of its top members following a raid by the FBI on the B-1 offices in Los Angeles, California and Washington, D.C. in 1977. B-1 was created by L. Ron Hubbard who patterned it after the intelligence system developed by Nazi spymaster Reinhard Gehlen. B-1 collected intelligence

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information on Scientology members and former members in what were known internally as B-1 files.) In my B-1 file produced in Christofferson was a 14-page "time track" or chronology which contained an entry refering to a report from Vaughn Young stating that I was having a homosexual relationship with Omar Garrison. I contacted Mr. Garrison in March 1985 after learning of Young's report to request him to testify regarding our relationship if it became an issue in the Christofferson case or other litigation. The Young report and the B-1 time track entry were viewed by many people, including many non-Scientologists. allegation of a homosexual relationship between Mr. Garrison and me, besides being false and libelous, is what is called in Scientology "Black Propaganda," a Scientology intelligence activity designed to destroy a perceived critic's reputation or life with malicious lies. The Young statement is also pursuant to L. Ron Hubbard's policy he called "Fair Game" in which he licensed Scientologists to take virtually any tortious or criminal act against critics he viewed as "enemies." policy letter of October 18, 1967, Hubbard stated:

"Fair Game. May be deprived of property or injured by any means by any Scientologist May be tricked, sued or lied to or destroyed."

3. In June 1985 I learned from my attorneys that in my cross-complaint in the case of <u>Scientology vs. Armstrong</u>, number C 420153 in the Superior Court of the State of California for the County of Los Angeles, plaintiff and cross-defendant organization had listed among 56 people whose depositions it intended to take Gina Garrison and William Crago. I know that Gina Garrison is the wife of Omar V. Garrison, and Mr. Crago is

his friend and former business associate. I had listed neither of them as potential witnesses for me and I had no intention to call them as witnesses. I telephoned Mr. Garrison at the time I learned of the organization's intention to take these depositions to ask him to call me if he learned that his wife or Mr. Crago were served with a deposition subpoena in my case.

Signed under the pains and penalties of perjury this 16th day of April, 1986.

Gerald Armstrang